

REMARKS

The Office has stated that Claims 13 and 20 are objected to, but would be allowed if rewritten in independent form, due to the limitation of the moveable actuator plate. Thus, independent claims 1, 9, 14 and 17 have been amended to include the limitation of the moveable actuator plate. Support for these amendments can be found on page 11, line 12, for example. Claims 13 and 20 have been cancelled. Thus, claims 1-11, 14, 16-19 and 21 are pending and remain in the application. No new subject matter has been added.

A. 35 U.S.C. § 103(a)

EPA in view of Muller - Claims 1-11, 14, 16-19 and 21

Claims 1-11, 16-19 and 21 of the parent application stand rejected under 35 U.S.C. § 103(a) as being anticipated by European Patent Application No. 0637042A published January 2, 1995 to Bradley Kanack, (hereinafter "EPA") in view of the U.S. Patent No. 64,674,319 issued June 23, 1987 to Richard S. Muller (hereinafter "Muller") (Office Action, pages 2).

Regarding independent claims 1, 9, 14 and 17, the Office admits that EPA does not disclose a stiffener on a center portion of the moveable charge plate, but that since Muller discloses such a stiffener it would have been obvious to impose the stiffener of Muller into the structure of EPA. (Office Action, page 2).

However, independent claims 1, 9, 14 and 17 have been amended to include the limitation of the moveable actuator plate, said limitation being suggested by the Office as being the reason for allowability of claims 13 and 20, if written in independent form. "To

establish prima facie obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art.” In *re Royka*, 490 F.2d 981,180 USPQ 580 (CCPA 1974). Because neither EPA nor Muller teach or even suggest the moveable actuator plate limitation of claims 1, 9, 14 and 17, claims 1, 9, 14 and 17 are not rendered obvious over EPA in view of the Muller. Thus, reconsideration and withdrawal of the Section 103(a) rejection of claims 1, 9, 14, and 17 are respectfully requested.

Because the dependent claims are allowable for at least the reason as depending from allowable base claims, Applicants are not substantively addressing the rejections of the dependent claims at this time. Thus, reconsideration and withdrawal of the Section 103(a) rejection of claims 2-8, 10-11, 16 and 18-19 and 21, which depend from claims 1, 9, 14 and 17 respectively, are respectfully requested.

In view of the foregoing remarks, the Applicants request allowance of the application. Please forward further communications to the address of record. If the Examiner needs to contact the below-signed agent to further the prosecution of the application, the contact number is (503) 264-0944.

Respectfully submitted,

Dated: December 20, 2004

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